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March 3, 2017

Re: *Alford v. City of New York et al.*, No. 11-cv-1583

By Electronic Filing

Honorable Steven M. Gold
United States Magistrate Judge
United States District Court for the
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Dear Judge Gold:

As discussed during the February 24, 2017 conference call, counsel have conferred, and without waiving any rights or objections (including as to the subject matter or scope of a deposition, if any, of J.A.), propose the following schedule for damages discovery as to J.A.:

- March 17, 2017: Parties to serve requests for document discovery relating to damages
- April 30, 2017: Completion of document discovery
- May 31, 2017: Completion of supplemental depositions of fact witnesses
- June 30, 2017: Completion of any medical/psychological examinations of J.A. by defendants' experts
- July 31, 2017: Submission of examiners' reports regarding examinations of J.A.
- August 31, 2017: Submission of J.A.'s experts' reports
- September 30, 2017: Submission of any rebuttal reports by defendants' experts
- October 31, 2017: Completion of expert depositions

We look forward to answering any questions that Your Honor may have about this schedule.

Respectfully,

Sharon Katz

cc: All counsel

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